

FEDERAL MARITIME COMMISSION

DOCKET NO. 15-11

IGOR OVCHINNIKOV, IRINA RZAEVA, and DENIS NEKIPELOV,

Complainants.

v.

**MICHAEL HITRINOV a/k/a MICHAEL KHITRINOV,
EMPIRE UNITED LINES CO., INC., and CARCONT, LTD.**

Respondents.

Consolidated With

DOCKET NO. 1953(I)

KAIRAT NURGAZINOV,

Complainants.

v.

**MICHAEL HITRINOV a/k/a MICHAEL KHITRINOV,
EMPIRE UNITED LINES CO., INC., and CARCONT, LTD.**

Respondents.

MOTION TO STRIKE AND SEAL

I, Sergey Kapustin, on my own behalf, and on behalf of Effect Auto Sales, Inc., G Auto Sales, Inc., Global Auto, Inc., SK Imports, Inc. d/b/a Global Cars, and Global Cargo Oy, hereby request on an emergency basis that certain confidential documents produced by the attorney for the complainants be stricken and sealed. Specifically, I am requesting that the documents contained in Appendix 3 to complainants' August 9, 2016 reply to a response (which are clearly

marked as CONFIDENTIAL) be stricken and sealed because they are confidential documents that were produced on behalf of Effect Auto Sales, Inc., G Auto Sales, Inc., and Global Auto, Inc. in a Federal court proceeding in New York pursuant to a confidentiality order which forbid their use in any other case for any other purpose. In order to avoid being irreparably harmed by this clear violation of the confidentiality order issued by the Federal court in New York these documents must be immediately stricken and sealed from any public view.

This Motion is supported by my Affirmation.

Signed on August 19, 2016



Sergey Kapustin